### UNITED STATES DISTRICT COURT

#### SOUTHERN DISTRICT OF NEW YORK

EMELIKE NWOSUOCHA,	: :
Plaintiff,	: 1:21-cv-04047 (VM)
v.  DONALD MCKINLEY GLOVER, II, et al.  Defendants.	USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED:10/18/21

## STIPULATION TO EXTEND DEFENDANTS' TIME TO ANSWER, MOVE, OR OTHERWISE RESPOND TO THE COMPLAINT

WHEREAS, on May 6, 2021, Plaintiff Emelike Nwosuocha filed his Complaint (the "Complaint") in the above-captioned action;

WHEREAS, Donald McKinley Glover, II, Ludwig Emil Tomas Goranssön, Kobalt Music Publishing America, Inc. d/b/a Songs of Kobalt Music Publishing, RCA Records ("RCA"), Sony Music Entertainment ("SME"), Young Stoner Life Publishing, LLC, Theory Entertainment LLC d/b/a 300 Entertainment, Atlantic Recording Corporation, Roc Nation Publishing LLC d/b/a Songs of Roc Nation, Songs of Universal, Inc., Warner Music Group Corp., and Warner-Tamerlane Publishing Corp. are named defendants in the Complaint (collectively, the "Defendants" or individually "Defendant");

WHEREAS, Plaintiff has either served or purported to serve each Defendant with a copy of the Summons and Complaint, but has not served RCA and Jeffrey Lamar Williams;

WHEREAS, RCA is a division or unit owned and operated by SME;

WHEREAS, RCA hereby accepts service of process of the Summons and Complaint;

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WHEREAS, Defendants agree not to contest service of process in exchange for

receiving additional time to answer, move, or otherwise respond to the Complaint;

WHEREAS, Plaintiff acknowledges that he will save considerable time and expense

by entering into this stipulation; and

WHEREAS, all of the parties to this stipulation agree that establishing one date for

Defendants to answer, move, or otherwise respond to the Complaint advances the interests of

judicial economy and saves the parties time and expense;

NOW, THEREFORE, Plaintiff and Defendants, by and through their undersigned

counsel or agents, hereby stipulate as follows:

1. Defendants shall answer, move, or otherwise respond to the Complaint on or before

Wednesday, December 8, 2021.

2. Defendants preserve all of their respective challenges, defenses, and responses to

the Complaint, except they shall not raise the defense of improper service of process.

3. This stipulation may be signed in counterparts, and any facsimile/PDF/electronic

signatures shall be deemed original signatures.

Dated: October 13, 2021

New York, New York

AIDALA BERTUNA & KAMINS PC.

By:

/s/ Imran H. Ansari

Imran H. Ansari

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Attorneys for Plaintiff Emelike Nwosuocha

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#### JONATHAN D. DAVIS, P.C.

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For purposes of this stipulation only,
Attorneys for Defendants Atlantic Recording
Corporation, Warner-Tamerlane Publishing
Corp., Warner Music Group Corp., Kobalt
Music Publishing America, Inc., d/b/a Songs
of Kobalt Music Publishing, RCA Records,
Sony Music Entertainment, Young Stoner Life
Publishing, LLC, Theory Entertainment LLC
d/b/a 300 Entertainment, and Songs of

#### GRODSKY, OLECKI & PURITSKY LLP

#### By: <u>/s/ Allen Grodsky</u>

Universal, Inc.

Allen Grodsky 11111 Santa Monica Blvd., Suite 1070 Los Angeles, California 90025 (310) 315-3009 As authorized signatory for purposes of this stipulation o/b/o Defendant Ludwig Emil Tomas Goranssön

# QUINN EMANUEL URQUHART & SULLIVAN LLP

By: <u>/s/ Alex Spiro</u>

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Attorneys for Defendant Roc Nation Publishing LLC d/b/a Songs of Roc Nation

SO ORDERED.	
10/18/21	
DATE	SICTOR MARRERO, U.S.D.J.